

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

<b>GABRIELA JAKELINE VELAZCO</b>	:	<b>CHAPTER 13</b>
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	:	
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<b>Debtor(s)</b>	:	<b>No. 19-10688 amc</b>

DEBTOR'S OBJECTION TO THE CERTIFICATION OF DEFAULT FILED BY  
NATIONSTAR MORTGAGE LLC, D/B/A MR. COOPER

COMES NOW, Gabriela Jakeline Velazco, Debtor and Respondent, by and through attorney of record, Michele Perez Capilato, Esquire, and submits the following Objection to the Certification of Default filed by Nationstar Mortgage, LLC, d/b/a Mr. Cooper:

1. The debtor believes she is completely current with all post-petition payments since entering into the Stipulation dated September 11, 2023.
2. Debtor further alleges she made the January 2024 payment by phone approximately two weeks ago and that customer service confirmed the account is current.
3. The Debtor is gathering her receipts and she will forward same to Counsel forthwith.

Wherefore Debtor respectfully requests this honorable Court refrain from signing the Order Modifying the Automatic Stay and set a hearing date giving Debtor an opportunity to provide proof of compliance with the Stipulation, and that Debtor have

judgment for reasonable costs and attorney fees incurred in connection with the defense of this matter.

January 25, 2024

Respectfully submitted,

Law Offices of Michele Perez Capilato

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